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**VIA ECF**

Honorable Dale E. Ho  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square, Courtroom 905  
New York, NY 10007



Dale E. Ho  
United States District Judge

Dated: December 12, 2023  
New York, New York

Re: Christopher Bates v. Port Authority of New York and New Jersey, et al.,  
23 cv 10160 (DEH)

Dear Judge Ho:

As Plaintiff's counsel in this matter, I respectfully write to request the rescheduling of the initial pretrial conference in this matter. Defense counsel, David Kromm, consents to this request. On November 21, 2023, the Court ordered that the initial conference take place on January 31, 2024, at 3 p.m. (ECF No. 6). This date does not work for Plaintiff because the undersigned is scheduled to begin an approximately six-day trial on January 29, 2024 in the Eastern District of New York (*Laferriere v. Port Authority of New York and New Jersey, et al.*, 23-cv-2728 [BMC]). Having conferred regarding an alternative date for the pretrial conference, the parties respectfully propose January 24, February 14, or February 28, 2024. This is the parties' first request for the rescheduling of the pretrial conference.

Thank you for your time and attention to this matter.

Respectfully submitted,



Cyrus Joubin, Esq.  
Attorney for Plaintiff

cc: David Kromm  
*Attorney for Defendants*